

One Natural Resources Way Springfield, Illinois 62702-1271 http://dnr.state.il.us

Pat Quinn, Governor Marc Miller, Director

January 6, 2015

Scott M. Willson Kimley-Horn and Associates 1001 Warrenville Rd, Suite 350 Lisle, IL 60532

RE: ADESA

IDNR Project #1506994

County: Cook

Dear Mr. Willson:

This letter concerns the consultation for construction of infrastructure for an auto auction facility in Cook County, Township 42 North, Range 9 East, Section 31. This project was submitted for consultation in accordance with the *Illinois Endangered Species Protection Act* [520 ILCS 10/11], the *Illinois Natural Areas Preservation Act* [525 ILCS 30/17], and Title 17 *Illinois Administrative Code* Part 1075.

The construction will include underground utilities, site grading, stormwater detention facility, and parking to serve the proposed auto auction facility. The project site lies within a Class III Special Resource Groundwater Area delineated under Illinois Administrative Rule [35 III. Adm. Code 620]. Class III Areas contribute groundwater to an Illinois Nature Preserve or other demonstrably unique or particularly sensitive ecological system, in this case to Trout Park Nature Preserve. This designation automatically subjects the area to Class I or potable water standards and allows an area to be subject to adjusted water quality standards tailored to species or ecosystem sensitivities.

Trout Park Nature Preserve supports three State-listed plant species: the endangered Purple-Flowering Raspberry, *Rubus odoratus*; the threatened Dwarf Raspberry, *Rubus pubescens*; and the threatened Forked Aster, *Aster furcatus*. Most importantly, the Nature Preserve protects a very rare (in Illinois) rich forested fen natural community which is dependent on high-quality ground water discharges.

The proposed action will result in nearly 100% impervious area over the project area, so that nearly all precipitation will be discharged as storm water into the adjacent abandoned quarry. The study prepared for the storm water report by Kimley-Horn Associates notes that the quarry water surface elevation is virtually constant, indicating that water is eliminated from the quarry through evaporation and infiltration.

The more than 4,000 outdoor parking spaces for vehicles in varying states of repair pose a significant risk of varying automotive fluids, heavy metals, and Polycyclic Aromatic Hydrocarbons (PAHs) being washed from the site and into the quarry, through which they may contribute to ground water contamination. While the storm water is designed to flow through bio-swales before it enters the detention basin and quarry, the Department recommends also routing the runoff

through one or more rain gardens prior to discharge into the detention basin. Organic matter is highly efficient in removing the types of pollutants likely to be generated at the site; a rain garden(s) will reduce the amount of pollutants reaching the basin.

Wetlands are also an efficient passive means of dealing with such pollutants. The Department recommends the on-site detention basin be designed to maximize the distance water must flow through the basin by the use of internal baffles, and to route the flow through one or more cells which mimic natural marshes.

Pollution of a Special Resource Ground Water can subject the responsible party to civil liability; adverse impacts to a dedicated Illinois Nature Preserve can result in both civil and criminal penalties pursuant to the *Illinois Natural Areas Preservation Act*. The Department recommends a surface and ground water monitoring program that would demonstrate the efficacy of the water treatment measures in avoiding pollution of the aquifer supplying Trout Park Nature Preserve.

Consultation under 17 Ill. Adm. Code Part 1075 is completed. In accordance with 17 Ill. Adm. Code 1075.40(h), please notify the Department of your decision regarding these recommendations.

This consultation is valid for two years unless new information becomes available that was not previously considered; the proposed action is modified; or additional species, essential habitat, or Natural Areas are identified in the vicinity. If the project has not been implemented within two years of the date of this letter, or any of the above listed conditions develop, a new consultation is necessary.

The natural resource review reflects the information existing in the Illinois Natural Heritage Database at the time of the project submittal, and should not be regarded as a final statement on the site being considered, nor should it be a substitute for detailed site surveys or field surveys required for environmental assessments. If additional protected resources are encountered during the project's implementation, you must comply with the applicable statutes and regulations. Also, note that termination does not imply IDNR's authorization or endorsement of the proposed action.

Please contact me if you have questions regarding this review.

Sincerely,

Karen Miller

Impact Assessment Section Phone (217) 785-5500

Kaum M. Miller

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